

# EXHIBIT A

IN THE CIRCUIT COURT OF THE EIGHTEENTH JUDICIAL CIRCUIT  
DUPAGE COUNTY, ILLINOIS

GREGORY STEELE, )  
)  
Plaintiff, )  
)  
v. )  
)  
COLLEGE PARK APARTMENTS LLC, )  
d/b/a COLLEGE PARK APARTMENT, )  
HAMPSTEAD BRADFORD PTNR, )  
a/k/a HAMPSTEAD BRADFORD COURT, )  
LLC, U.S. DEPARTMENT OF HOUSING )  
AND URBAN DEVELOPMENT (HUD), )  
and THE UNITED STATES OF AMERICA )  
)  
Defendants. )

Candice Adams  
e-filed in the 18th Judicial Circuit Court  
DuPage County  
ENVELOPE: 19356666  
2022LA000792  
FILEDATE: 9/2/2022 4:16 PM  
Date Submitted: 9/2/2022 4:16 PM  
Date Accepted: 9/6/2022 8:38 AM  
SK

Case No.:

2022LA000792

**COMPLAINT AT LAW**

NOW COMES the Plaintiff, GREGORY STEELE, by and through their attorneys, Robert A. Langendorf, P.C., and complains of the Defendants, COLLEGE PARK APARTMENTS LLC, d/b/a COLLEGE PARK APARTMENT, HAMPSTEAD BRADFORD PTNR, a/k/a HAMPSTEAD BRADFORD COURT, LLC, U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD), and THE UNITED STATES OF AMERICA, and in support thereof states as follows:

**GENERAL ALLEGATIONS**

1. On and prior to September 2<sup>nd</sup>, 2021, Defendant, COLLEGE PARK APARTMENTS LLC, d/b/a COLLEGE PARK APARTMENT, owned, operated, managed, maintained, inspected, leased, and/or controlled the premises located at or about 922 College Boulevard in the City of Addison, County of DuPage, and State of Illinois.

2. On and prior to September 2<sup>nd</sup>, 2021, Defendant, HAMPSTEAD BRADFORD PTNR, a/k/a HAMPSTEAD BRADFORD COURT, LLC, owned, operated, managed, maintained,

inspected, leased, and/or controlled the premises located at or about 922 College Boulevard in the City of Addison, County of DuPage, and State of Illinois.

3. On and prior to September 2<sup>nd</sup>, 2021, Defendant, U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD), owned, operated, managed, maintained, inspected, leased, and/or controlled the premises located at or about 922 College Boulevard in the City of Addison, County of DuPage, and State of Illinois.

4. On and prior to September 2<sup>nd</sup>, 2021, Defendant, THE UNITED STATES OF AMERICA, owned, operated, managed, maintained, inspected, leased, and/or controlled the premises located at or about 922 College Boulevard in the City of Addison, County of DuPage, and State of Illinois.

5. At all times material to this matter, Defendants, by and through their agents, servants, and/or employees, had the duty to exercise ordinary care in the maintenance of the premises so that the premises would be reasonably safe for the persons lawfully on it.

6. At the time and place aforesaid, Plaintiff, GREGORY STEELE, was lawfully upon said premises as a tenant of Defendants when Plaintiff was bitten by a brown recluse spider, then and there causing Plaintiff severe injuries.

7. That Plaintiff had notified Defendants' agents, servants, and/or employees of the presence of brown recluse spiders in his residence prior to being bitten.

8. That Plaintiff had notified Defendants' agents, servants, and/or employees that he wished for his residence to be exterminated to make it safe for Plaintiff and those lawfully upon the premises.

9. At the time and place aforesaid, Defendant, COLLEGE PARK APARTMENTS LLC, d/b/a COLLEGE PARK APARTMENT, knew or should have known about the presence of pests upon the premises, including but not limited to brown recluse spiders.

10. At the time and place aforesaid, Defendant, HAMPSTEAD BRADFORD PTNR, a/k/a HAMPSTEAD BRADFORD COURT, LLC, knew or should have known about the presence of pests upon the premises, including but not limited to brown recluse spiders.

11. At the time and place aforesaid, Defendant, U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD), knew or should have known about the presence of pests upon the premises, including but not limited to brown recluse spiders.

12. At the time and place aforesaid, Defendant, THE UNITED STATES OF AMERICA, knew or should have known about the presence of pests upon the premises, including but not limited to brown recluse spiders.

13. At the time and place aforesaid, Defendant, COLLEGE PARK APARTMENTS LLC, d/b/a COLLEGE PARK APARTMENT, knew or should have known that the conditions of the premises represented a dangerous condition to those lawfully on the premises.

14. At the time and place aforesaid, Defendant, HAMPSTEAD BRADFORD PTNR, a/k/a HAMPSTEAD BRADFORD COURT, LLC, knew or should have known that the conditions of the premises represented a dangerous condition to those lawfully on the premises.

15. At the time and place aforesaid, Defendant, U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD), knew or should have known that the conditions of the premises represented a dangerous condition to those lawfully on the premises.

16. At the time and place aforesaid, Defendant, THE UNITED STATES OF AMERICA, knew or should have known that the conditions of the premises represented a dangerous condition to those lawfully on the premises.

17. At all times material to this matter, no safety precautions were taken by Defendants to remove the aforesaid pests to remedy the dangerous condition.

18. At all times material to this matter, Plaintiff, GREGORY STEELE, was exercising due care and caution for their safety and was free from any and all contributory fault.

**COUNT I – GREGORY STEELE v. COLLEGE PARK APARTMENTS LLC, d/b/a**

**COLLEGE PARK APARTMENT**

19. Plaintiff adopts and re-alleges paragraphs 1 – 18 as fully set forth herein.

20. At all times material to this matter, Defendant, COLLEGE PARK APARTMENTS LLC, d/b/a COLLEGE PARK APARTMENT, was under a duty to own, operate, manage, maintain, inspect, lease, and/or control the premises located at or about 922 College Boulevard in the City of Addison, County of DuPage, and State of Illinois.

21. At the aforesaid time and place, Defendant, COLLEGE PARK APARTMENTS LLC, d/b/a COLLEGE PARK APARTMENT, breached the aforementioned duty through one or more of the following acts and/or omissions:

- a. Carelessly and negligently owned, operated, managed, maintained, inspected, leased, and/or controlled the premises;
- b. Carelessly and negligently failed to remove the dangerous condition from the premises;
- c. Carelessly and negligently failed to take any safety precautions whatsoever to remove and/or prevent the dangerous condition, knowing or where it should have been known that its failure to do so represented a danger to those lawfully on the premises;

- d. Carelessly and negligently failed to properly inspect the premises, knowing or where it should have known that its failure to do so represented a danger to those lawfully on the premises;
- e. Carelessly and negligently failed to exterminate the brown recluse spiders after being notified of their presence.

22. As a direct and proximate result of one or more of the Defendant's negligent acts or omissions, the Plaintiff, GREGORY STEELE, then and there sustained severe and permanent injuries and was, and will be hindered and prevented, from attending to their usual duties and affairs of life, has lost wages, and has lost and will lose the value of that time as aforementioned. Further, Plaintiff suffered great pain and anguish, both in mind and body, and will in the future continue to suffer. Plaintiff further expended and became liable for large sums of money for medical care and services while endeavoring to become healed and cured of said injuries.

WHEREFORE, the Plaintiff, GREGORY STEELE, requests judgment against the Defendant, COLLEGE PARK APARTMENTS LLC, d/b/a COLLEGE PARK APARTMENT, in an amount greater than \$1,000,000.00 plus the costs of this lawsuit.

**COUNT II – GREGORY STEELE v. HAMPSTEAD BRADFORD PTNR, a/k/a**

**HAMPSTEAD BRADFORD COURT, LLC**

23. Plaintiff adopts and re-alleges paragraphs 1 – 18 as fully set forth herein.

24. At all times material to this matter, Defendant, HAMPSTEAD BRADFORD PTNR, a/k/a HAMPSTEAD BRADFORD COURT, LLC, was under a duty to own, operate, manage, maintain, inspect, lease, and/or control the premises located at or about 922 College Boulevard in the City of Addison, County of DuPage, and State of Illinois.

25. At the aforesaid time and place, Defendant, HAMPSTEAD BRADFORD PTNR, a/k/a HAMPSTEAD BRADFORD COURT, LLC, breached the aforementioned duty through one or more of the following acts and/or omissions:

- a. Carelessly and negligently owned, operated, managed, maintained, inspected, leased, and/or controlled the premises;
- b. Carelessly and negligently failed to remove the dangerous condition from the premises;
- c. Carelessly and negligently failed to take any safety precautions whatsoever to remove and/or prevent the dangerous condition, knowing or where it should have been known that its failure to do so represented a danger to those lawfully on the premises;
- d. Carelessly and negligently failed to properly inspect the premises, knowing or where it should have known that its failure to do so represented a danger to those lawfully on the premises;
- e. Carelessly and negligently failed to exterminate the brown recluse spiders after being notified of their presence.

26. As a direct and proximate result of one or more of the Defendant's negligent acts or omissions, the Plaintiff, GREGORY STEELE, then and there sustained severe and permanent injuries and was, and will be hindered and prevented, from attending to their usual duties and affairs of life, has lost wages, and has lost and will lose the value of that time as aforementioned. Further, Plaintiff suffered great pain and anguish, both in mind and body, and will in the future continue to suffer. Plaintiff further expended and became liable for large sums of money for medical care and services while endeavoring to become healed and cured of said injuries.

WHEREFORE, the Plaintiff, GREGORY STEELE, requests judgment against the Defendant, HAMPSTEAD BRADFORD PTNR, a/k/a HAMPSTEAD BRADFORD COURT, LLC, in an amount greater than \$1,000,000.00 plus the costs of this lawsuit.

**COUNT III – GREGORY STEELE v. U.S. DEPARTMENT OF HOUSING AND URBAN  
DEVELOPMENT (HUD)**

27. Plaintiff adopts and re-alleges paragraphs 1 – 18 as fully set forth herein.

28. At all times material to this matter, Defendant, U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD), was under a duty to own, operate, manage, maintain, inspect, lease, and/or control the premises located at or about 922 College Boulevard in the City of Addison, County of DuPage, and State of Illinois.

29. At the aforesaid time and place, Defendant, U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD), breached the aforementioned duty through one or more of the following acts and/or omissions:

- a. Carelessly and negligently owned, operated, managed, maintained, inspected, leased, and/or controlled the premises;
- b. Carelessly and negligently failed to remove the dangerous condition from the premises;
- c. Carelessly and negligently failed to take any safety precautions whatsoever to remove and/or prevent the dangerous condition, knowing or where it should have been known that its failure to do so represented a danger to those lawfully on the premises;
- d. Carelessly and negligently failed to properly inspect the premises, knowing or where it should have known that its failure to do so represented a danger to those lawfully on the premises;
- e. Carelessly and negligently failed to exterminate the brown recluse spiders after being notified of their presence.

30. As a direct and proximate result of one or more of the Defendant's negligent acts or omissions, the Plaintiff, GREGORY STEELE, then and there sustained severe and permanent injuries and was, and will be hindered and prevented, from attending to their usual duties and affairs of life, has lost wages, and has lost and will lose the value of that time as aforementioned. Further, Plaintiff suffered great pain and anguish, both in mind and body, and will in the future continue to suffer. Plaintiff further expended and became liable for large sums of money for medical care and services while endeavoring to become healed and cured of said injuries.



WHEREFORE, the Plaintiff, GREGORY STEELE, requests judgment against the Defendant, U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD), in an amount greater than \$1,000,000.00 plus the costs of this lawsuit.

**COUNT IV – GREGORY STEELE v. THE UNITED STATES OF AMERICA**

31. Plaintiff adopts and re-alleges paragraphs 1 – 18 as fully set forth herein.

32. At all times material to this matter, Defendant, THE UNITED STATES OF AMERICA, was under a duty to own, operate, manage, maintain, inspect, lease, and/or control the premises located at or about 922 College Boulevard in the City of Addison, County of DuPage, and State of Illinois.

33. At the aforesaid time and place, Defendant, THE UNITED STATES OF AMERICA, breached the aforementioned duty through one or more of the following acts and/or omissions:

- a. Carelessly and negligently owned, operated, managed, maintained, inspected, leased, and/or controlled the premises;
- b. Carelessly and negligently failed to remove the dangerous condition from the premises;
- c. Carelessly and negligently failed to take any safety precautions whatsoever to remove and/or prevent the dangerous condition, knowing or where it should have been known that its failure to do so represented a danger to those lawfully on the premises;
- d. Carelessly and negligently failed to properly inspect the premises, knowing or where it should have known that its failure to do so represented a danger to those lawfully on the premises;
- e. Carelessly and negligently failed to exterminate the brown recluse spiders after being notified of their presence.

34. As a direct and proximate result of one or more of the Defendant's negligent acts or omissions, the Plaintiff, GREGORY STEELE, then and there sustained severe and permanent injuries and was, and will be hindered and prevented, from attending to their usual duties and

affairs of life, has lost wages, and has lost and will lose the value of that time as aforementioned. Further, Plaintiff suffered great pain and anguish, both in mind and body, and will in the future continue to suffer. Plaintiff further expended and became liable for large sums of money for medical care and services while endeavoring to become healed and cured of said injuries.

WHEREFORE, the Plaintiff, GREGORY STEELE, requests judgment against the Defendant, THE UNITED STATES OF AMERICA, in an amount greater than \$1,000,000.00 plus the costs of this lawsuit.

WHEREFORE, the Plaintiff, GREGORY STEELE, requests judgment against the Defendants, COLLEGE PARK APARTMENTS LLC, d/b/a COLLEGE PARK APARTMENT, HAMPSTEAD BRADFORD PTNR, a/k/a HAMPSTEAD BRADFORD COURT, LLC, U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD), and THE UNITED STATES OF AMERICA, jointly and severally, in an amount greater than \$1,000,000.00 plus the costs of this lawsuit.

Respectfully Submitted:

By: 

Plaintiff's Attorney

Robert A. Langendorf, P.C.  
134 N LaSalle, Suite 1515  
Chicago, IL 60602  
(312) 782-5933  
DuPage No.: 46850  
[Robert@langedorfpc.com](mailto:Robert@langedorfpc.com)

IN THE CIRCUIT COURT OF THE EIGHTEENTH JUDICIAL CIRCUIT  
 DUPAGE COUNTY, ILLINOIS

GREGORY STEELE,

Plaintiff,

v.

COLLEGE PARK APARTMENTS LLC,  
 d/b/a COLLEGE PARK APARTMENT,  
 HAMPSTEAD BRADFORD PTNR,  
 a/k/a HAMPSTEAD BRADFORD COURT,  
 LLC, U.S. DEPARTMENT OF HOUSING  
 AND URBAN DEVELOPMENT (HUD),  
 and THE UNITED STATES OF AMERICA)

Defendants.

Candice Adams  
 e-filed in the 18th Judicial Circuit Court  
 DuPage County  
 ENVELOPE: 19356666  
 2022LA000792  
 FILEDATE: 9/2/2022 4:16 PM  
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 SK

Case No.:

2022LA000792

**AFFIDAVIT OF DAMAGES**

The undersigned being first duly sworn upon oath, deposes and states that he is an attorney for the party to the above entitled cause of action seeking money damages and that this cause of action:

XX DOES EXCEED \$50,000.00

\_\_\_\_\_ DOES NOT EXCEED \$50,000.00

Under penalties as provided by law pursuant to Section 1-109 of the Illinois Code of Civil Procedure, the undersigned certifies that the statement set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief, and as to such matters the undersigned certifies as aforesaid the he/she verily believes the same to be true. The undersigned has knowledge of the facts set forth in this affidavit and if called as a witness, and sworn under oath would testify as stated herein.

Respectfully Submitted:

By: \_\_\_\_\_

Plaintiff's Attorney

ROBERT A. LANGENDORF, P.C.  
 134 N. LaSalle Street – Suite 1515  
 Chicago, Illinois 60602  
 Tel.: (312) 782-5933  
 DuPage No.: 46850  
[Robert@langendorfpcc.com](mailto:Robert@langendorfpcc.com)

\*  
STATE OF ILLINOISUNITED STATES OF AMERICA  
IN THE CIRCUIT COURT OF THE EIGHTEENTH JUDICIAL CIRCUIT

COUNTY OF DU PAGE

Gregory Steele

2022LA000792

PLAINTIFF

CASE NUMBER

DATE OF SERVICE

VS

TO BE INSERTED BY OFFICER ON COPY LEFT WITH  
DEFENDANT OR OTHER PERSON

College Park Apartments LLC et al.

SUMMONS  
CIRCUIT COURT

File Stamp Here

DEFENDANT

☒ ORIGINAL ☐ ALIAS

The United States of America  
c/o: United States Attorney's Office for  
the Northern District of Illinois  
319 S. Dearborn, 5th Floor  
Chicago, IL 60604  
To each Defendant:

You are Summoned and Required to file an answer to the complaint in this case, a copy of which is hereto attached, or otherwise file your appearance in the office of the Clerk of the Circuit Court, 505 N. County Farm Road, Wheaton, Illinois, within 30 days after service of this summons not counting the day of service.

If you fail to do so, a judgment by default may be entered against you for the relief asked in the complaint.

To the Officer

This summons must be returned by the officer or other person to whom it was given for service, with endorsement of service and fees, if any, immediately after service and not less than three (3) days before the date of remote appearance. If service cannot be made, this summons shall be returned so endorsed.

This summons may not be served later than thirty (30) days after its date.

## WITNESS:

Name: Robert A. Langendorf, P.C. ☐ Pro SeDuPage Attorney Number: 46850Attorney for: PlaintiffAddress: 134 N. LaSalle, Suite 1515City/State/Zip: Chicago, IL 60602Telephone Number: 3127825933Email: Robert@langendorfpc.com

CANDICE ADAMS, Clerk of the Eighteenth  
Judicial Circuit Court, and the seal thereof,  
Wheaton, Illinois 9/2/2022 4:16 PM



Date 9/2/2022 SK  
Candice Adams  
Deputy Clerk

E-filing is now mandatory for documents in civil cases with limited exemptions. To e-file, you must first create an account with an e-filing service provider. Visit <http://efile.illinoiscourts.gov/service-providers.htm> to learn more and to select a service provider. If you need additional help or have trouble e-filing, visit <http://www.illinoiscourts.gov/FAQ/gethelp.asp> or talk to your circuit clerk's office. If you cannot e-file, you may be able to get an exemption that allows you to file in-person or by mail. Ask your local clerk for more information or visit [www.illinoislegalaid.org](http://www.illinoislegalaid.org).

## NOTE:

The filing of an appearance or answer with the Circuit Court Clerk requires a statutory filing fee, payable at the time of filing. If you are unable to pay your court fees, you can apply for a fee waiver. For information about defending yourself in a court case (including filing an appearance or fee waiver), or to apply for free legal help, go to [www.illinoislegalaid.org](http://www.illinoislegalaid.org). You can also ask your local circuit clerk's office for a free waiver application.

If you need legal advice concerning your legal responsibility as a result of this summons being serviced upon you and you don't have a lawyer, you can call the DuPage Bar Association, Lawyer Referral Service at 630-653-9109.

CANDICE ADAMS, CLERK OF THE 18th JUDICIAL CIRCUIT COURT ©  
WHEATON, ILLINOIS 60187-0707

**SHERIFF'S FEES**

Service and return ..... \$ \_\_\_\_\_

Miles: ..... \$ \_\_\_\_\_

**Total** ..... \$ \_\_\_\_\_

Sheriff of \_\_\_\_\_ County

**SHERIFF'S RETURN**

I certify that I served this summons on defendant as follows:

☐(a) (Individual - **personal**):

By leaving a copy and a copy of the complaint with each individual as follows:

☐(b) (Individual - **abode**):

By leaving a copy and a copy of the complaint at the usual place of abode of each individual with a person of his family, of the age of 13 years or upwards, informing that person of the contents of the summons, and also by sending a copy of the summons and the complaint in a sealed envelope with postage fully prepaid, addressed to each individual at the usual place of abode, as follows:

☐

(c) (Corporation):

By leaving a copy and a copy of the complaint with the registered agent, officer, or agent of each corporation as follows:

☐

(d) (Other service):

☐

(e) (Unable to Serve):

By \_\_\_\_\_, Deputy Badge Number: \_\_\_\_\_

Name of Defendant \_\_\_\_\_

Name of Person \_\_\_\_\_

summons given to \_\_\_\_\_

Sex \_\_\_\_\_ Race \_\_\_\_\_ Approximate age \_\_\_\_\_

Place of service \_\_\_\_\_

City, State \_\_\_\_\_

Date of service \_\_\_\_\_ Time \_\_\_\_\_

Date of Mailing \_\_\_\_\_

Special Process Server of \_\_\_\_\_

Name of Defendant \_\_\_\_\_

Name of Person \_\_\_\_\_

summons given to \_\_\_\_\_

Sex \_\_\_\_\_ Race \_\_\_\_\_ Approx. age \_\_\_\_\_

Place of service \_\_\_\_\_

City, State \_\_\_\_\_

Date of service \_\_\_\_\_ Time \_\_\_\_\_

Date of Mailing \_\_\_\_\_

Sheriff of \_\_\_\_\_ County

County Illinois License # \_\_\_\_\_

By \_\_\_\_\_